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November 29, 2024

MEMO ENDORSED

The Honorable Valerie E. Caproni
United States District Court Judge for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Donte Goulbourne et al*, 23-cr-00544 (S.D.N.Y.)

Dear Judge Caproni:

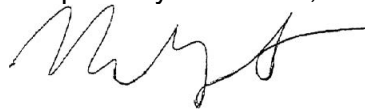
On behalf of Donte Goulbourne, a defendant in the above-captioned case, we respectfully request that he be allowed to take his long-time friend, Tearah Gaines, to the hospital when the time comes for her to give birth, in the event that this occurs after Mr. Goulbourne's curfew. We understand that Ms. Gaines is currently 38 weeks pregnant. Mr. Goulbourne would notify his pretrial officer in the event that this occurs after his curfew.

Ms. Gaines lives in the building next to Mr. Goulbourne, at 30 Richman Plaza, Apartment 8E, Bronx, New York 10453, and would like to give birth at the NewYork-Presbyterian David H. Koch Center, located at 1283 York Ave, New York, New York 10065.

Pretrial objects to this request, and the Government has deferred to Pretrial.

Thank you for your consideration of this request.

Respectfully Submitted,



Michael J. Gilbert
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Connie Dang, Assistant U.S. Attorney
Francesca Piperato, U.S. Pretrial Services Officer

Application DENIED. Mr. Goulbourne is free to take his friend to the hospital if the need arises between the hours of 8:00 A.M. and 8:00 P.M., but his friend will need to make separate arrangements to ensure that Mr. Goulbourne complies with the conditions of his pretrial release.

SO ORDERED.



12/2/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE